

LAW OFFICES  
RANKIN, LANDSNESS, LAHDE,  
SERVERIAN & STOCK  
A LAW CORPORATION

MICHAEL C. SERVERIAN  
DAVID J. STOCK  
JON A. HEABERLIN  
MICHELLE C. TING

96 NORTH THIRD STREET, SUITE 500  
SAN JOSE, CALIFORNIA 95112-5572  
TELEPHONE: (408) 293-0463  
FACSIMILE: (408) 293-9514  
E-MAIL: dstock@rlss.com  
Website: www.rlss.com

MAURICE J. RANKIN (1888-1975)  
G. DAVID LANDSNESS (1944-1997)

BERNARD P. LAHDE (Ret.)

**SAN CARLOS OFFICE**  
939 LAUREL STREET, SUITE D  
SAN CARLOS, CALIFORNIA 94070

November 14, 2007

*VIA E-FILING & US MAIL*  
Honorable Richard Seeborg  
United States Magistrate Judge  
United States District Court for the  
Northern District of California  
280 South First Street  
Courtroom 4, 5<sup>th</sup> Floor  
San Jose, CA 95113

*VIA E-FILING & US MAIL*  
Donald H. Cram, III, Esq.  
SEVERSON & WERSON  
One Embarcadero Center  
Suite 2600  
San Francisco, CA 94111

Re: Ford Motor Credit Company, LLC v. Lewis Family Enterprises, Inc., et al.  
United States District Court No. C 07-03301 RS

Dear Judge Seeborg and Mr. Cram:

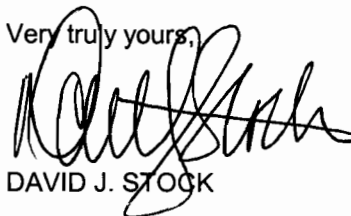
By order entered on October 1, 2007, the Court set a Case Management Conference in this matter for November 28, 2007, at 2:30 p.m. By that same order, the Court directed the parties to meet and confer regarding the case management matters set forth in Civil L.R. 16-10, and further directed the parties to file a Joint Case Management Conference Statement no later than November 21, 2007.

On October 29, 2007, the Court granted Defendants' motion to set aside the Clerk's entries of default, and permitted Defendants to answer the complaint. However, on November 5, 2007, Defendants filed a motion for enlargement of time to respond to the complaint. Namely, Defendants requested an additional twenty (20) days to prepare and file their counterclaims against Plaintiff, Plaintiff's parent company, Ford Motor Company; and Ford Dealer Development, a program operated by Ford Motor Company. Plaintiff opposed Defendants' motion on November 8, 2007. The parties are presently awaiting the Court's decision on this motion.

In the interim, the parties are unable to fully prepare a meaningful Joint Case Management Conference Statement. Specifically, if the Court grants the motion for enlargement of time, Defendants' counterclaim will result in the addition of two new parties and several new causes of action.

Accordingly, Defendants would request that the Court reset the Case Management Conference and the date for the filing of the Joint Case Management Conference Statement.

Very truly yours,



DAVID J. STOCK

DJS:mct